

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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Federal Communications Commission  
Office of Secretary

In the Matter of )  
)  
The Use of N11 Codes and Other ) CC Docket No. 92-105  
Abbreviated Dialing Arrangements ) DA 96-1500

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Comments of Ameritech to  
Public Notice Regarding Reservation of 311  
For Non-Emergency Police Calls

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Ameritech files its comments on the Department of Justice's request that 311 be reserved on a national basis for use by local communities for non-emergency access to police. Ameritech has consistently supported the use of the codes like 311, called N11 codes, for important public interest uses, as well as to provide access to basic exchange telephone functions such as repair and directory assistance.<sup>1</sup> At the same time, Ameritech opposes use of N11 codes for access to private information services, since there is an insufficient supply of N11 codes to meet the demand.<sup>2</sup> Further, Ameritech believes that when the Commission or a state regulator agency considers potential new public interest uses of an N11 code, priority should be given to uses that provide

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<sup>1</sup> Ameritech Comments filed in this Docket on June 5, 1992 ("N11 Comments") at 3-5 and Reply Comments filed July 15, 1992 ("N11 Reply Comments") at 2-3. See also, In the Matter of Requests of Federal Agencies and Others for the Assignment of N11 Codes, IAD File No. 94-101, Comments 2-3.

<sup>2</sup> N11 Comments 6-8. and N11 Reply Comments at 2-4.

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access to services and information in emergency situations such as 911.<sup>3</sup>

N11 codes are three digit telephone codes, with a first digit of any number between 2 and 9, and the last two digits of 1 (e.g.: 911 or 311). Thus, there are only eight possible N11 codes (211 to 911) of which only four remain unassigned (211, 311, 511, and 711). The demand for the unassigned N11 codes has far exceeded the four that are available. For that reason, Ameritech continues to oppose assignment of these codes to private information service providers, and has not used N11 codes itself for that purpose.

Ameritech supports the goal of providing to local citizens convenient access to local police. Ameritech also believes that a uniform dialing arrangement for non-emergence access to police can promote this objective, and is anxious to work with the agencies involved to develop such a plan, at the state or national level. For these reasons, Ameritech believes that non-emergency access to police is a public interest purpose that should be considered for use of the 311 code.

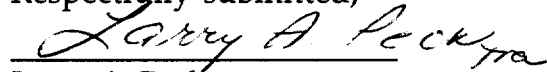
However, it is premature to decide whether 311 is the optimal arrangement for uniform non-emergency access to police, or if this is the best possible use of the 311 code. Moreover, technical, cost and cost recovery issues

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<sup>3</sup> N11 codes have traditionally been used to provide access to repair (611) and directory assistance (411) of local exchange carriers. Some local exchange carriers also use 811 to provide access to their business office operations for ordering telephone services. New local exchange carriers are also able to program their switches to use these same N11 codes to provide access to their repair, business office and directory assistance functions to their customers. It should not be forgotten that directory assistance is used by customers to obtain telephone numbers in both emergency and non-emergency situations.

associated with assignment of 311 should be identified, investigated and resolved before a decision is made to dedicate 311 to this purpose. This can best be done by the industry working with the agencies involved, either at the national or state level.

Respectfully submitted,

A handwritten signature in cursive script, reading "Larry A. Peck".

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October 10, 1996

CERTIFICATE OF SERVICE

I, Edith Smith, do hereby certify that a copy of the foregoing Comments of Ameritech to Public Notice Regarding Reservation of 311 for Non-Emergency Police Calls has been served on the party listed below, via first class mail, postage prepaid, on this 10th day of October 1996.

By: Edith Smith  
Edith Smith

Joseph E. Brann  
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